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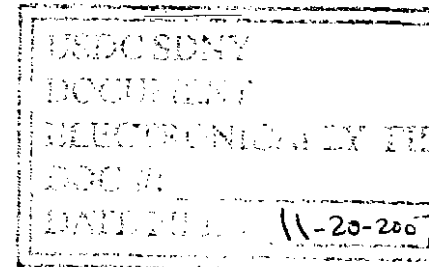
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MEMO ENDORSED 19



November 16, 2007

Our Ref: 355-07/DPM/MAM

BY HAND

The Honorable John F. Keenan
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

The conference is adjourned to
January 8, 2008, at 10:00 am.

SO ORDERED.

Dated: New York, New York

Re: Modesta Shipholding Ltd. v. LS Trading Engineering, S.A.,
07-6942 (JFK)

November 19, 2007

Dear Judge Keenan:

John F. Keenan
U.S.D.J.

We represent the Plaintiff Modesta Shipholding Ltd. in connection with the above-referenced Rule B maritime attachment action which has been reassigned to Your Honor. We write to request that the initial pre-trial conference scheduled for November 20, 2007 be adjourned 45-days.

Plaintiff initiated this action on August 2, 2007, seeking security in the sum of \$315,268.35 for its maritime claim via an attachment of Defendant's property in this District pursuant to Rule B. Judge Sprizzo granted Plaintiff's application on the same day. On or about August 28, 2007, Deutsche Bank advised us that, pursuant to the Order of Attachment, it had seized the sum of \$3,348.48 belonging to Defendant. On that same day, we provided Notice of Attachment. Indeed, in response to our Notice, Defendant contacted us on August 29 and demanded copies of the pleadings. We responded the same day, e-mailing to Defendant copies of the Verified Complaint, the Summons, the Order of Attachment and the Process of Maritime Attachment and Garnishment. To date, however, Defendant has not appeared or moved to vacate the attachment. We continue to effect daily service of the writ in an attempt to fully secure Plaintiff's claim.

The Honorable Richard J. Sullivan
November 16, 2007
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In light of the foregoing considerations, we therefore respectfully request that Your Honor grant the within application.

We thank the Court for its attention to this matter.

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP

A handwritten signature in black ink, reading "Manuel A. Molina". The signature is written in a cursive, flowing style. The first name "Manuel" is written in a larger, more prominent script, followed by "A." and "Molina". The signature is positioned above the printed name "Manuel A. Molina".

Manuel A. Molina